



## DEPARTMENT OF TRANSPORTATION

February 14, 2014

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**Re: Comments on the Preliminary Evaluation of Alternative Methods of  
Transportation Analysis**

Mr. Calfee:

Thank you for the opportunity to meet with you and other members of the Governor's Office of Planning and Research (OPR) last year to discuss the City of Pasadena's efforts to develop new mobility metrics which are better aligned with the City's goals to promote non-auto travel. The City of Pasadena's General Plan promotes the priority of non-auto trips and sets the tone for the Mobility Element with the Guiding Principal "*Pasadena will be a city where people can circulate without cars.*" Through recent General Plan outreach efforts the community expressed the need for a mobility metric which adequately reflects impacts to both motorized and non-motorized road users.

We support OPR's efforts to develop alternatives to Level of Service (LOS) for evaluating transportation impacts. We are also exploring Vehicle Miles Traveled as a metric to capture the environmental benefits of transit and active transportation mode trips. Our experience with the application of the 2010 Highway Capacity Manual Multi-Modal LOS (MMLOS), while challenging, provided the opportunity to disclose a balanced approach to accommodating all modes. We ask that as OPR moves forward in developing a recommendation on an alternative to LOS that you will not preclude cities from developing and adopting additional metrics to the one ultimately amended into the CEQA guidelines.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "F. C. Dock".

Frederick C. Dock  
Director of Transportation

c: Michael J. Beck, City Manager, Pasadena  
David Jones, Emanuels Jones & Associates